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9 GLASFORMS, INC., a California corporation

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13
14 DONG AH TIRE & RUBBER CO., LTD.,
15 a Korean Corporation,

CASE NO. C 06-03359 JF
(Consolidated With Case No. C 06-00213 JF)

Plaintiff,

**STIPULATION SETTING SECOND
AMENDED PRETRIAL SCHEDULE AND
[PROPOSED] ORDER THEREON**

16 v.
17 GLASFORMS, INC., a California
18 corporation,

19 Defendant/Third-Party
Plaintiff.

20 v.
21 CTG INTERNATIONAL (NORTH
22 AMERICA) INC., an Indiana Corporation;
23 TAISHAN FIBERGLASS, INC., a
corporation organized under the laws of the
24 People's Republic of China,

25 Third-Party Defendants.

1 This stipulation is entered into between third-party plaintiff Glasforms, Inc.
2 (“Glasforms”), third-party defendant CTG International (North America) Inc. (“CTG”), and third-
3 party defendant Taishan Fiberglass, Inc. (“Taishan”), by and through their respective counsel of
4 record.

RECITALS

6 WHEREAS, by stipulation and order of the Court dated December 20, 2007 (Document
7 45), the current fact discovery cut-off in these consolidated cases is February 29, 2008;

8 WHEREAS Glasforms and Plaintiff Dong Ah Tire & Rubber, Co. Ltd. (“Dong Ah”) have
9 reached a settlement of Dong Ah’s claims against Glasforms and, therefore, Dong Ah is not a
10 necessary signatory to this stipulation;

11 WHEREAS some additional documents remain to be produced and several depositions
12 remain to be taken and completed in this case, including the completion of depositions of
13 Glasforms personnel, the deposition of a CTG employee who is expected to return to California
14 from China in mid-March 2008, and a Taishan employee who will travel to California for
15 deposition in late February 2008;

16 WHEREAS the parties anticipate needing until April 30, 2008 to complete the above-
17 referenced discovery;

18 WHEREAS, so that the parties may complete pending fact discovery in this case,
19 including the above-referenced depositions, prior to proceeding to expert disclosures and other
20 pre-trial matters, Glasforms, CTG, and Taishan have agreed to enter into this stipulation to further
21 extend the fact discovery cut-off and the remaining pre-trial deadlines approximately two (2)
22 months as described below;

WHEREAS, with respect to the subject of potential new discovery requests not already propounded and necessitated by newly discovered information, the parties agree that they shall each have the same rights going forward that they would otherwise have had if the fact discovery period ended on the original cut-off date in this case of December 15, 2007 (i.e., by entering into this Stipulation, no party hereto waives any rights they may have to propound such additional discovery pursuant to the agreement of the parties or Court order for good cause);

1 NOW, THEREFORE IT IS HEREBY AGREED AND STIPULATED by and between
2 Glasforms, CTG, and Taishan, by and through their respective counsel of record, and subject to
3 Court approval, that the Pretrial Schedule previously approved by the Court should be amended
4 again and that the trial date and pretrial deadlines be re-set as follows:

5	<u>Event</u>	<u>Date Set</u>
6	Cut-Off For Already Pending Fact Discovery	April 30, 2008
7	Exchange Expert Disclosures/Reports	May 5, 2008
8	Last Day to File Dispositive Motions	May 19, 2008
9	Exchange Rebuttal Expert Disclosures/Reports	June 6, 2008
10	Expert Discovery Cut-Off	July 3, 2008
11	Final Witness Lists	July 3, 2008
12	Motions in Limine	July 21, 2008
13	Oppositions to Motions in Limine and Trial Briefs	August 4, 2008
14	Pretrial Conference	August 29, 2008
15	Jury Trial (2 week estimate)	September 8, 2008
16	IT IS RESPECTFULLY REQUESTED that the Court issue a Second Amended Pretrial	
17	Scheduling Order conforming to the schedule set forth above based upon this Stipulation of the	
18	parties.	

19 IT IS SO STIPULATED:

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1 Dated: February 14, 2008

HOPKINS & CARLEY
A Law Corporation

3 By: _____ /s/
4

5 Robert A. Christopher
Tod C. Gurney
6 Attorneys for Defendant/Third-Party
Plaintiff GLASFORMS, INC.

7 Dated: February 14, 2008

CAMPBELL, WARBURTON,
FITZSIMMONS, SMITH, MENDELL
&PASTORE

9 By: _____ /s/
10

11 J. Michael Fitzsimmons
Lisa Jeong Cummins
12 Attorneys for Third Party Defendant
CTG INTERNATIONAL (NORTH
AMERICA) INC.

13 Dated: February 14, 2008

BAKER & DANIELS, LLP

15 By: _____ /s/
16

17 David K. Herzog
April E. Sellers
18 Attorneys for Third-Party Defendant
TAISHAN FIBERGLASS, INC.

19 IT IS SO ORDERED:

20 Dated: 2/22/08, 2008

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HONORABLE JEREMY FOGEL

1 PURSUANT TO GENERAL ORDER NO. 45,

2 I, Tod C. Gurney, the ECF User transmitting and filing this Stipulation Setting Second
3 Amended Pretrial Schedule and [Proposed] Order Thereon, attest that I have obtained the
4 concurrence of April Sellers, and Lisa Cummins on this filing.

5 I declare the foregoing under the penalty of perjury.

6 Dated: February 14, 2008

7 HOPKINS & CARLEY
A Law Corporation

8

9 By: _____ /s/
10 Tod C. Gurney
11 Attorneys for Third-Party Plaintiff,
12 GLASFORMS, INC.
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